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Attorney for Plaintiff EBRAHIM JUMA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EBRAHIM JUMA,

Plaintiff,

vs.

CLARK COUNTY WATER
RECLAMATION DISTRICT, an agency of
Clark County, Nevada; DOE individuals 1-10;
ROE Nevada state government entities or
political subdivisions,

Defendants.

Case No.: 2:20-cv-00120-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

(First Request)

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 35) from the current due date of Monday, December 27, 2021 (December 24 being a holiday) through and including **Tuesday, January 18, 2022** (Monday January 17 being a holiday)

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel's office has been operating on a reduced schedule due to the December holiday season;
2. Additionally, Plaintiff's counsel is has had, and is facing, a very heavy workload with respect to briefing including the following:

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- 1 a. Opening Brief and Reply Brief on an important and novel issue of
2 workers' compensation law with the Opening Brief having been due and
3 filed on December 6, 2021 and the Reply Brief due on December 23,
4 2021;
5
6 b. Mediation brief for private mediation due and filed on December on
7 December 9, 2021 for successful mediation held on December 16, 2021;
8
9 c. Reply Brief to Ninth Circuit due and filed on December 8, 2021;
10
11 d. Responses filed to motions in this case filed on December 17, 2021
12 Additionally, Plaintiff's counsel has had to respond to extensive discovery
13 requests that have been due over the past two weeks. Also Plaintiff's counsel
14 had a major workers' compensation CLE that took place over December 9 and
15 10, 2021 which he attended and was a speaker. He has had depositions
16 including one in Winnemucca, Nevada coming up on December 22, 2021.
17 He continues to advise and consult new clients and has assisted in the filing of
18 discrimination charges with Nevada Equal Rights Commission and EEOC.
19 Being short staffed, running reduced hours, and the heavy workload set forth
20 above necessitates more time to respond to the Motion for Summary Judgment
21 in this case.

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23 ///

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25 ///

This stipulation to extend the deadline is made in good faith and not for purposes of delay.

DATED this 21st day of December, 2021.

DATED this 21st day of December, 2021.

KEMP & KEMP, ATTORNEYS AT LAW


LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ James P. Kemp
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ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

December 22, 2021

DATED: _____

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